

Section 1: Background and Purpose and Need for Proposed Project

1.1 Introduction

1.1.1 SUMMARY OF PROPOSED PROJECT

The Channel Islands Telephone Company (CITC) has submitted an application to install telecommunication facilities at up to 15 locations within the Channel Islands National Park. These new telecommunication facilities would serve to improve the currently limited telecommunication capabilities on the five islands.

1.1.2 ENVIRONMENTAL REVIEW

CEQA and NEPA

This Draft Initial Study/Environmental Assessment (IS/EA) was prepared in compliance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Issues that are uniquely applicable to CEQA or NEPA were identified within the applicable sections of the document. Some terminology differs between CEQA and NEPA. This Draft IS/EA uses the following terms for consistency and clarity:

- The term “proposed project” is used in this document in a manner equivalent to the term “proposed action,” which is commonly used in environmental documents prepared under NEPA.
- “Affected environment” is used in this document, which is approximately equivalent to the standard CEQA term of “environmental setting.”
- “Environmental consequences” is the term used in this document in place of the more common CEQA term of “environmental impacts.”

Lead Agencies

Pursuant to CEQA Guidelines Section 15051, designation of a lead agency is required to determine the agency responsible for certification of the environmental documents that evaluate project impacts and propose mitigation. The lead agency under CEQA for the proposed project is the Californian Public Utilities Commission (CPUC) because it has the role of reviewing a grant request from the applicant for this project. The National Park Service (NPS) is the lead agency under NEPA (40 CFR 1501.5) because the proposed project would involve lands under NPS jurisdiction and would, therefore, require a right-of-way permit from NPS.

1.2 Document Structure

This document includes a description of the proposed project, CITC's Channel Islands Telecommunications Project; a description of the alternatives for the proposed project; and an evaluation of potential consequences of the alternatives. The contents of the document are summarized below.

Section 1: Background and Purpose and Need for Proposed Project – This section includes a discussion of project background; project purpose and need; project objectives; local, state, and NPS planning context; local, state, and federal regulatory authorities and jurisdictions; and a summary of public involvement.

Section 2: Proposed Project and Alternatives – This section describes the No Project Alternative and the Preferred Alternative (proposed project) under consideration by CPUC and NPS.

Section 3: Affected Environment and Environmental Consequences – This section provides an overview of the affected environment, and includes descriptions of existing natural, cultural, and social resources in the project area. This section also presents an analysis of the potential environmental consequences of the proposed project and any alternatives that were analyzed in detail. Section 3 also contains an analysis of the project's cumulative impacts when considered with other known past, present, or reasonably foreseeable projects in the project area.

Section 4: Consultation and Coordination – This section summarizes the proposed project's compliance with Federal Executive Orders; public outreach efforts; and a list of agencies contacted during preparation of this document.

Section 5: List of Preparers and Reviewers – This section lists the names and qualifications of the persons who were primarily responsible for preparing and reviewing this IS/EA.

Section 6: List of Acronyms and Abbreviations – This section defines the technical terms and acronyms and abbreviations used in the document.

Section 7: Bibliography – This section lists the references cited in the document.

In addition to the sections summarized above, the following appendices to the document provide additional supporting data and information:

Appendix A – Channel Islands Telecommunication Project Revised Project Application

Appendix B – Cumulative Projects List

Appendix C – Historic Resource Inventory and Evaluation Report

Appendix D – Biological Resource Tables

Appendix E – Scoping Letters

Appendix F – Comments Received in Response to Scoping Letters

1.3 Purpose and Need for the Project

The proposed project is needed because NPS and National Oceanic and Atmospheric Administration (NOAA) staff currently have limited ability to communicate between locations within the Channel Islands National Park and with personnel and other contact points on the mainland. The islands have a very high frequency radio system that allows communication among radio-equipped ranger stations on the five islands, as well as from handheld radios. Satellite Internet service is also available at some ranger stations that allows secure access to government Internet provider addresses on the mainland. NPS personnel also possess cellular telephones; however, cellular service is unreliable because the islands are at the outer limit of the cellular service area. The location of the islands makes cellular telephone service unreliable on some parts of the islands and wholly absent on others. Recreational visitors to the islands have no landline telephone access and little to no cellular telephone reception.

The proposed project would provide cellular telephone and landline service at all ranger stations, campgrounds, residences of the five islands, and the Santa Rosa Island and San Miguel Island airstrips, as well as on all portions of the islands within an approximately 0.5-mile radius of each of the up to 15 proposed facility locations. The new service is intended to be consistent and reliable with a reliability of available service of 99.99999 percent. The new service would provide telecommunication capabilities to both Channel Islands National Park staff and visitors, including service for personal cellular telephone communications.

The purpose of the proposed telephone service is to provide:

- Improved communication for NPS and NOAA staff, researchers, NPS residents, and recreational visitors among the five islands, as well as between the islands and the mainland
- Communication in the case of an emergency or accident to allow for swifter emergency response
- Improved real-time reporting of weather data to allow for more accurate travel predictions, which will reduce unnecessary and/or aborted boat and aircraft trips to and from the islands for both NPS and commercial/recreational vehicles

1.4 Management Goals

The management goals for the project are described in the sections below.

1.4.1 CALIFORNIA PUBLIC UTILITIES COMMISSION

The management goals of CPUC are to serve the public interest by protecting consumers and ensuring the provision of safe, reliable utility service and infrastructure at reasonable rates, with a commitment to environmental enhancement and a healthy California economy.

CPUC's goals also include regulating utility services, stimulating innovation, and promoting competitive markets, where possible, in the communications, energy, transportation, and water industries (CPUC 2009).

1.4.2 NATIONAL PARK SERVICE

The management goals of NPS are to maintain a safe, functional, and orderly environment that provides compatible opportunities for resource preservation and enjoyment by visitors and employees (NPS 2006).

NPS's goals also include protecting the rights, safety, and security of all visitors and employees (NPS 2006).

NPS has the following additional goals that are specific to Channel Islands National Park:

- Obtain the maximum level of resource restoration and preservation, commensurate with the legislated purposes of the park (NPS 1985)
- Provide for visitor use and enjoyment of the park and for visitor understanding of its unique natural and cultural resources (NPS 1985)
- Ensure long-term management of the park in accordance with the approved management plans (NPS 1985)

1.5 Decisions to be Made by Various Government Agencies

The Channel Islands Telecommunication Project involves reviews and decisions that must be made by CPUC (CEQA Lead Agency), NPS (NEPA Lead Agency), and other agencies. Table 1.5-1 lists the various agencies that have permitting authority over the proposed project. Following the table is a discussion of the various decisions and permits that will be required prior to implementation of the proposed project.

1.5.1 FEDERAL AGENCIES

NPS Decision

NPS is the federal lead agency for environmental review and approval of the project under NEPA. The Pacific West Regional Director of NPS has the authority to grant a Finding of No Significant Impact (FONSI) and approve the EA document. NPS also has jurisdiction over the issuance of special use permits and right-of-way permits for installation of the proposed telecommunication facilities.

Federal Communications Commission Decision

The applicant is required to complete Federal Communications Commission (FCC)-mandated forms (e.g., FCC Form 601) for licensing new sites, relicensing of upgraded cell sites, and revoking licensing of sites that will no longer be part of the communication system. FCC also requires the licensee to review the proposed project for environmental consequences under Title 47 Code of Federal Regulations (CFR) §§ 1.1301 to 1.1319.

U.S. Fish and Wildlife Service Decision

An applicant is required to perform a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) whenever a proposed project has the potential to have an adverse impact on protected species. Section 7 consultation with USFWS would need to be completed before NPS can adopt a

Table 1.5-1: Permitting Agencies for the Proposed Project

Agency Name	Permit or Authorization Requirement
<i>Federal Agencies</i>	
National Park Service (NPS)	Environmental review and approval under NEPA; issuance of special use permits installation and right-of-way permits for authorization to operate in a National Park
Federal Communications Commission (FCC)	Licensing and relicensing of telecommunication sites
U.S. Fish and Wildlife Service (USFWS)	None, but informal Section 7 consultation would occur to further ensure compliance with the ESA (to be completed prior to NPS issuance of a FONSI)
U.S. Navy	Although NPS manages facilities on San Miguel Island, the island is technically owned by the U.S. Navy, which may require permits
<i>State and Local Agencies</i>	
California Public Utilities Commission (CPUC)	Environmental review and approval under CEQA; approval of grant request for installation and operation
State Historic Preservation Office (SHPO)	Section 106 consultation, review, and documentation with SHPO (to be completed prior to NPS issuance of a FONSI)
California Coastal Commission (CCC)	No permits required (to be verified by the applicant prior to NPS issuance of right-of-way permits)
County of Santa Barbara	No permits required (to be verified by the applicant prior to NPS issuance of right-of-way permits)
Santa Barbara County Air Pollution Control District (SBCAPCD)	No permits required (to be verified by the applicant prior to NPS issuance of right-of-way permits)

FONSI under NEPA. The project would not impact any listed plant or animal species with incorporation of identified mitigation measures, and a formal consultation under Section 7 of the Endangered Species Act (ESA) is therefore not anticipated; however, NPS intends to conduct informal consultation with USFWS regarding this project.

U.S. Navy

Although the NPS manages San Miguel Island, the island is technically owned by the U.S. Navy. The U.S. Navy may have additional permitted requirements for the two proposed project locations (locations 3 and 4) on San Miguel Island.

1.5.2 STATE AND LOCAL AGENCIES

CPUC Decision

CPUC is the state lead agency for environmental review and approval of the project under CEQA. CPUC has the authority to approve the IS and associated Mitigated Negative Declaration (MND),

including adoption of findings regarding mitigation, monitoring, and reporting. CPUC also has the authority to approve the grant request by the applicant to install and operate the proposed telecommunication facilities.

State Historic Preservation Office Decision

The applicant is required to perform a Section 106 consultation, review, and documentation with SHPO as required by the National Historic Preservation Act (NHPA). Section 106 consultation with SHPO must be completed before NPS can adopt a FONSI under NEPA.

California Coastal Commission Decision

CCC determines whether the project is in compliance with the California Coastal Act (CCA) and related regulations. CCC also has the authority to issue a Coastal Development Permit for all sites within the jurisdiction of CCC. The 15 proposed project sites are all located within lands that are managed by NPS and, therefore, CCC does not have jurisdiction over the proposed project.

County of Santa Barbara

It appears at this time that no permits for this project are required from the County of Santa Barbara. The project applicant will need to provide written confirmation that no permits are required from this county before NPS can issue right-of-way permits for the project.

Santa Barbara County Air Pollution Control District

It appears at this time that no permits for this project are required from SBCAPCD. The project applicant will need to provide written confirmation that no permits are required from this air district before NPS can issue right-of-way permits for the project.

1.6 Summary of Public Scoping Process

Several agencies and groups have been identified as possible stakeholders for the proposed project. These groups include island residents (including private residents, researchers, and NPS staff); visitors to the Channel Islands National Park; and the various local, state, and federal agencies that have jurisdiction in and around the Channel Islands area.

Agencies and island residents (both private residents and NPS employees) were contacted directly to inform them of the proposed project and to request comments. Scoping meetings were not held for this project on the islands or the mainland due to the remote nature of the islands. Copies of the scoping letters sent to private residents and NPS employees are included in Appendix E.

Only two comments were received from island residents during the scoping process. Neither individual had any comments regarding the scope of the environmental analysis. Both of these comments were received verbally via telephone. Six local, state, and federal agencies submitted comments during the scoping process. These comment letters are included in Appendix F. A summary of each comment is provided in Table 1.6-1.

Table 1.6-1: Summary of Comments Received During Scoping

Agency Name	Permit or Authorization Requirement
<i>Individuals</i>	
Dr. Tim Vail, Santa Rosa Island	Dr. Vail inquired regarding whether he would be receiving telephone and Internet service as part of this project.
Mr. James Roberts, NPS staff stationed at the Channel Islands National Park	Mr. Roberts' comments focused on the engineering of the project, urging the use of high-efficiency solar panels in the project design.
<i>Agencies</i>	
Santa Barbara County Air Pollution Control District (SBCAPCD)	SBCAPCD provided guidance in assessing air quality impacts and identified requested topics to be included in the evaluation. These topics included air quality impacts of both construction and operation of the project, as well as an assessment of project-related greenhouse gas emissions and the project's contribution to global climate change.
Native American Heritage Commission (NAHC)	NAHC provided recommendations to adequately assess and mitigate project-related impacts to archaeological resources. NAHC provided a list of 22 appropriate Native American contacts for consultation concerning the project locations. Letters providing a brief project description and project location maps and requesting a response were sent out to all of the identified contacts in December 2009. These 22 letters are included in Appendix E. One response to these letters has been received. Mr. Freddie Romero, a representative of the Band of Chumash Indians Elders Council, stated verbally in a telephone call that the Elders Council is concerned that the project may lead to greater commercialization of the Channel Islands National Park, and thereby result in greater long-term environmental impacts to the islands. Mr. Romero also stated that the Elders Council will not be submitting any formal comments at this time, but will instead wait to review the Draft IS/EA before making formal comments.
Santa Barbara County Planning and Development Department – Development Review Services	The Santa Barbara County Planning and Development Department comments focused on the need to address biological resource impacts from any proposed fire clearance, confirm that the facilities would be operating with the allowable FCC radio frequency ranges, and provide appropriate site-specific information for each of the proposed installation locations.
Ventura County Air Pollution Control District (VCAPCD)	VCAPCD stated that the proposed project's local and regional impacts to air quality would be less than significant based on its significance thresholds.
County of Ventura Resource Management Agency	The letter from the County of Ventura Resource Management Agency indicated that the project as proposed would have less than significant regional and local air quality impacts.
U.S. Fish and Wildlife Service (USFWS)	The USFWS letter addressed the need for the project to comply with various permitting and regulatory requirements, including Section 7 of the ESA of 1973 and the Migratory Bird Treaty Act of 1918.

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